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UNITED STATES DISTRICT COURT
 FOR THE CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

JANET GARCIA, GLADYS ZEPEDA,
 MIRIAM ZAMORA, ALI EL-BEY,
 PETER DIOCSON JR, MARQUIS
 ASHLEY, JAMES HAUGABROOK,
 individuals, Ktown FOR ALL, an
 unincorporated association;
 ASSOCIATION FOR RESPONSIBLE
 AND EQUITABLE PUBLIC
 SPENDING, an unincorporated
 association

Plaintiffs,

v.

CITY OF LOS ANGELES, a municipal
 entity; DOES 1-50,

Defendants.

Case No.: 2:19-cv-06182-DSF-PLA
*[Assigned to: Honorable Dale S.
 Fischer]*

**DECLARATION OF
 CATHERINE SWEETSER IN
 SUPPORT OF PLAINTIFFS’
 OPPOSITION TO DEFENDANT
 CITY OF LOS ANGELES’S
 MOTION TO DISMISS
 SUPPLEMENTAL COMPLAINT
 TO THE FIRST AMENDED
 COMPLAINT (FED. R. CIV.
 PROC. 12(b)(6))**

DECLARATION OF CATHERINE SWEETSER

I, Catherine Sweetser, hereby declare and state as follows:

1. I am an attorney representing the Plaintiffs in this case.

2. On September 5, 2019, Plaintiffs' counsel met and conferred with opposing counsel regarding a proposed motion to dismiss.

3. On September 23, 2019, Plaintiffs' counsel filed an amended complaint and a motion for a supplemental complaint. On October 17, 2019, Plaintiffs filed their supplemental complaint, incorporating events that happened after the filing of the original complaint.

4. In the meet and confer on September 5, 2019, defense counsel asked for details on Mr. Haugabrook's location and the dates of cleanups.

5. In the amended complaint, Plaintiffs' counsel clarified where Mr. Haugabrook lived and the dates of the cleanups.

6. On Friday, October 11, 2019, counsel met and conferred about the amended complaint. At that point, defense counsel did not ask for any clarification on Mr. Haugabrook's location or express that it remained insufficiently pled.

7. In the motion, defense counsel stated that the location at the time of the cleanups was not pled. That was the first Plaintiffs' counsel had heard of any such deficiency in the amended complaint. If defense counsel had raised the issue with Plaintiffs' counsel directly, Plaintiffs' counsel could have explained that they just changed the language concerning the location and had not amended the language around it. In fact, Mr. Haugabrook was residing at that location in March 2019, four to six months prior to the filing of the first complaint.

8. Similarly, on September 5, 2019, defense counsel stated in the meet and confer on standing that they were objecting to Ktown for All's standing on the grounds that they did not understand the mission sufficiently. They did not say that Ktown for All needed to name individual members. Defense counsel failed to

1 meet and confer on their claim that the identities of individual members are
2 necessary at the pleading stage.

3
4 I declare under penalty of perjury under the laws of the United States that
5 the foregoing is true and correct.

6
7 Executed on November 12, 2019, in Los Angeles, California.

8
9 
10 Catherine Sweetser